

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Bankruptcy No. 16-24005-CMB
)	
MICHELLE R. BOWERS,)	Document No.: 78 & 80, 87
Debtor)	
~~~~~	)	Chapter 13
PORTFOLIO RECOVERY ASSOCIATES, LLC,	)	
ASSIGNEE OF ALLY BANK, BY AND	)	
THROUGH ITS SERVICING AGENT, PRA	)	
RECEIVABLES MANAGEMENT, LLC	)	
Movant	)	<b><u>HEARING DATE:</u></b>
vs.	)	Thursday, November 29, 2018
	)	11:00 a.m.
MICHELLE R. BOWERS, Debtor	)	
and SHAWN P. BOWERS, Codebtor	)	
Respondents	)	

**STIPULATION**

COME NOW, this ^{23rd} day of October, 2018, Debtors Michelle R. Bowers and Codebtor, Shawn P. Bowers, by and through their attorney, Joseph J. Nash, Esquire, and Portfolio Recovery Associates, LLC. Assignee of Ally Bank ("PRA"), by and through its servicing agent, PRA Receivables Management, LLC, by and through its attorneys, Mester & Schwartz, P.C., hereby stipulate the following terms of settlement of the Motion for Relief from Automatic Stay and Motion for Relief from Codebtor Stay:

WHEREAS the Debtor and Codebtor own a 2016 Dodge Ram 2500, V.I.N 3C6URCL0GG173671 ("vehicle"); and

WHEREAS the Debtor's confirmed plan does not provide for the treatment of the claim related to the vehicle through the plan; and

WHEREAS the vehicle is in the possession of the Codebtor; and

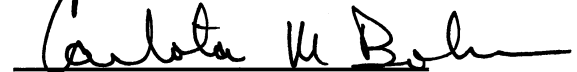
WHEREAS PRA filed a Motion for Relief from Automatic Stay and Motion for Relief from Codebtor Stay ("Motions"); and

WHEREAS the parties wish to address issues related to the payment of the claim outside of the bankruptcy; and

WHEREAS the Debtors and PRA seek to resolve the Motions; it is hereby stipulated and agreed that:

1. The automatic stay and codebtor stall be lifted with respect to the Movant related to the 2016 Dodge Ram 2500, V.I.N 3C6URCL0GG173671.
2. It is further Ordered that this grant of relief from stay shall remain in full force and effect, notwithstanding any subsequent conversion of this case to another chapter.
- ~~3. The stay of the Order as provided under Rule 4001 (a)(3), F.R.B.P., is hereby waived.~~

BY THE COURT:



Carlota M. Bohm  
U.S. BANKRUPTCY JUDGE

Respectfully submitted,

MESTER & SCHWARTZ, P.C.

Dated: 10/22/18

/s/ Laurence A. Mester

Laurence A. Mester, Esquire  
Attorney for Portfolio Recovery Associates, LLC  
Assignee of Ally Bank ("PRA"), by and through its  
servicing agent, PRA Receivables Management,  
LLC  
1333 Race Street  
Mester & Schwartz, P.C.  
Philadelphia, PA 19107  
(267) 909-9036  
lmester@mesterschwartz.com  
PA Atty I.D. 79184

FILED  
10/23/18 2:46 pm  
CLERK  
U.S. BANKRUPTCY  
COURT - WDPA

Dated: 10/22/18

/s/ Joseph J. Nash  
Joseph J. Nash, Esquire  
Attorney for Debtor  
The Nash Law Office  
P.O. Box 673  
164 S. Main Street  
Slippery Rock, PA 16057  
(724) 406-0616  
attorneynash@nashlawoffice.net  
PA Atty I.D. 204583

CHAPTER 13 TRUSTEE'S OFFICE

Dated: 10/22/18

/s/ Jana Pail  
Jana Pail, Esq.  
Attorney for Chapter 13 Trustee  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219  
(412) 471-5566  
jpail@chapter13trusteedpa.com  
PA Atty I.D. 88910

**Certificate of Notice Page 4 of 4**  
United States Bankruptcy Court  
Western District of Pennsylvania

In re:  
Michelle R Bowers  
Debtor

Case No. 16-24005-CMB  
Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0315-2

User: dric  
Form ID: pdf900

Page 1 of 1  
Total Noticed: 1

Date Rcvd: Oct 23, 2018

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 25, 2018.

db +Michelle R Bowers, 214 Willow Run Dr., Butler, PA 16001-1262

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Oct 25, 2018

Signature: /s/Joseph Speetjens

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**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 23, 2018 at the address(es) listed below:

Daniel R. Schimizzi on behalf of Creditor John Deere Financial dschimizzi@wtplaw.com,  
LLescallette@wtplaw.com/sharding@wtplaw.com  
James Warmbrodt on behalf of Creditor JPMORGAN CHASE BANK, N.A. bkgroup@kmlawgroup.com  
James Warmbrodt on behalf of Creditor Harley-Davidson Credit Corp bkgroup@kmlawgroup.com  
Jerome B. Blank on behalf of Creditor Wells Fargo Bank, NA pawb@fedphe.com  
Joseph J. Nash on behalf of Debtor Michelle R Bowers attorneynash@nashlawoffice.net  
Laurence A. Mester on behalf of Creditor Portfolio Recovery Associates, LLC  
lmester@mesterschwartz.com, jottinger@mesterschwartz.com/jschwartz@mesterschwartz.com  
Mario J. Hanyon on behalf of Creditor Wells Fargo Bank, NA pawb@fedphe.com  
Office of the United States Trustee ustpregion03.pi.ecf@usdoj.gov  
Ronda J. Winnecour cmecf@chapter13trusteedpa.com  
S. James Wallace on behalf of Creditor Peoples TWP LLC sjw@sjwpgh.com,  
srk@sjwpgh.com; PNGbankruptcy@peoples-gas.com

TOTAL: 10